

PLAINTIFFS' DESIGNATION OF RICK BROWN

(Counter-Designations in italicized text)

Deposition on March 4, 2003

Page/line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Counter-Designations	Defendants' Cross-Examination Designations	Plaintiffs' Objections and Counter-Designations	Defendants' Responses to Plaintiffs' Objections and Counter-Designations
6:2-6					
6:12-14					
12:1, 6-9	Irrelevant. Chevron/Texaco Global Technologies has no involvement whatsoever in this litigation, and the question and answer refer to 2003, years after the events at issue. FRE 401-403.				
12:13-16					
14:14-16					
24:4-25:7	Irrelevant, confusing and a waste of time.				

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SFI-582640v1
SFI-596925v1

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	FRE 401-403. Further, the designated testimony relates to events in 1993, years before the matters at issue in this case.				
25:18-25					
38:17-19					
38:24-39:15					
235:20-236:24	FCPA review is a legal requirement and is therefore not evidence of agency or any other theory of liability. See Dict. # 1853 (jury instructions) at 37 (FCPA review "should not be considered as evidence of agency").				

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243:2-244:19	This testimony is therefore irrelevant. FRE 401. Further, any probative value this testimony has is substantially outweighed by its unfair prejudice and waste of time. FRE 403. FCPA review analyzed only whether a proposed payment complied with federal law, not whether it was a good business decision. Admitting this evidence would necessitate a mini-trial on the nature and purpose of FCPA review.				

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			245:13-23		
245:24-246:22					